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OCT 16 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

October 16, 2002

Memorandum of **Ex Parte** Presentation

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket Nos. 01-338, 96-98 and 98-147

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(1) of the Commission's rules Broadview Networks submits the attached written *ex parte* in the above-captioned docketed proceeding. This submission provides more detail to the discussion held on October 10, 2002 between Tim Bell, John Carr and the undersigned representing Broadview Networks ("Broadview"), and Rob Tanner, Gina Spade, Jeremy Miller, Mike Engel, Aaron Goldberger and Daniel Shiman of the Wireline Competition Bureau of the Federal Communications Commission.

Pursuant to Section 1.1206(b)(1), an original and two copies of this filing are provided for inclusion in the public record of the above-referenced proceeding. Please direct any questions regarding this matter to the undersigned at 215-293-8715

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca H. Sommi", written over a horizontal line.

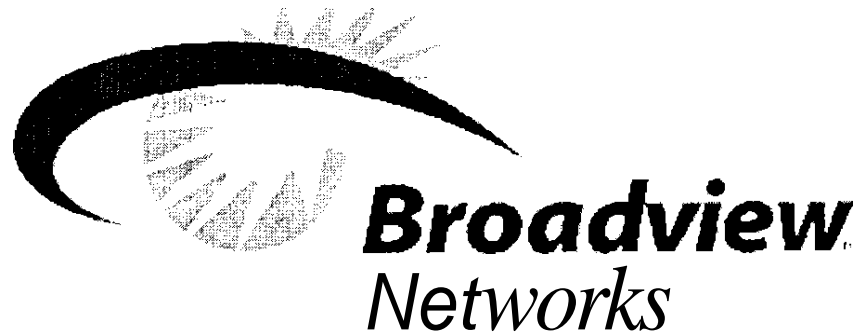
Rebecca H. Sommi

Attachment

Cc Rob Tanner (wiattachment)
Gina Spade (wiattachment)
Jeremy Miller (wiattachment)
Mike Engel (w/attachment)
Aaron Goldberger (wiattachment)
Dan Shiman (wiattachment)
Qualex International

File 01-338, 96-98, 98-147
0+2
EDWARDS

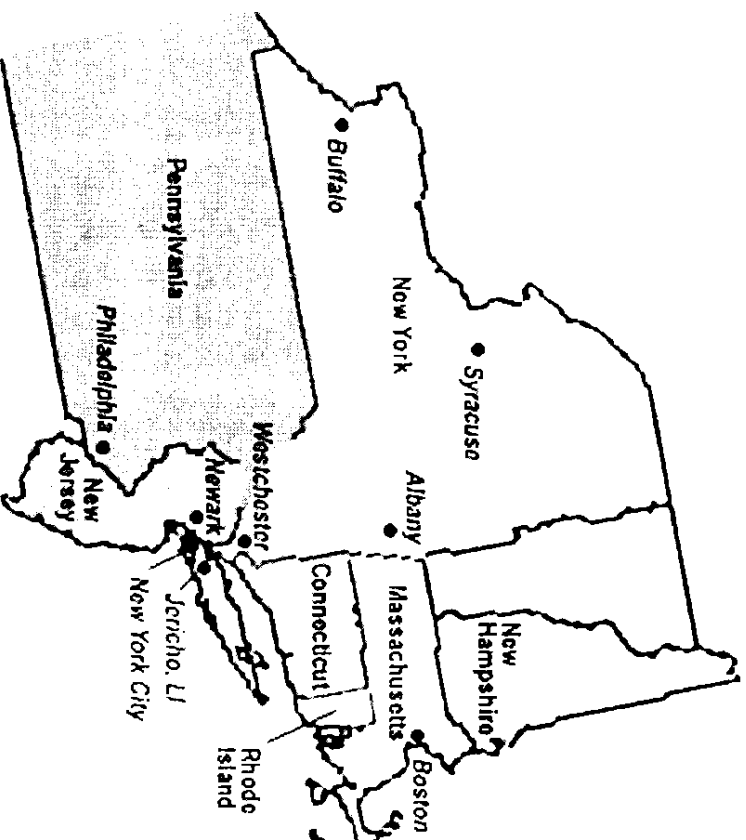
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**Project Management Process
For UNE-Loop Cutover
FCC Ex Parte
CC Docket Nos. 01-338, 96-98 and 98-147
October 16, 2002**



Broadview Networks' Geographic Coverage





Managing the Transition to Facilities-Based Competition

- Broadview concentrates first by acquiring residential and business customers in a specific geography via UNE-P. UNE-P has permitted Broadview Networks to function as a true competitor to the ILEC in terms of:
 - Variety of Product Offerings
 - Speed of provisioning and service availability
 - Ubiquitous footprint
- Once customer densities have been achieved, Broadview leases interoffice transport and places equipment in ILEC central offices
- Project Managed Hot Cuts with Verizon allow for the migration of customers to Broadview's network



Outline of the Project Managed Hot-Cut Process

- CLEC must have established voice-grade customer base to request a Project Managed Hot Cut
- Line Count Densities must be achieved for a Project
 - CLEC is responsible for notifying Verizon when densities are met
 - Minimum of 75 lines is required before a CLEC can schedule a Project
- Orders are Placed with Verizon
 - Broadview notifies Verizon orders will be submitted for a Project
 - Verizon confirms if Broadview's dates can be met prior to submission of orders
 - In order to take advantage of the Project process all orders (LSR's) for lines in the selected central office must be submitted within 48-hours of each other



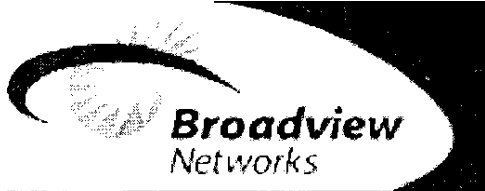
Outline of the Project Managed Hot-Cut Process

- Verizon's Interval is 15 business days from the date of the receipt of Project orders
- Project "Cut Times" are scheduled during normal business hours 8:00 AM to 6:00 PM.
- Broadview receives a call from Verizon approximately every 20 minutes to confirm that 10-20 lines have been Hot-Cut. Broadview then activates LNP with NPAC which enables inbound calling.
- Customer will experience some down time



Limitations of the Process

- Projects are not included in the Performance Metrics Plans
 - No Penalties to Verizon if dates/quality standards are not met
- Central Offices with greater than 125 Lines will be hot cut over multiple days
- Limitations on number of lines that can be cut in a given day
 - Approximately 125 Lines per Central Office for the ENTIRE CLEC COMMUNITY
 - Limited number of Central Offices (and lines within) can be cut within a specific geographic area. Verizon determines number of Central Offices based on work-load



Technical Limitations

- Not all Lines can be supported on UNE-L
 - Copper must be available. Varies by region
 - Integrated Digital Loop Carriers (IDLC) can not support UNE-L. Spare copper must be available in the Central Office to re-provision the customer. This requires two (2) hot cuts for the customer, first to copper facilities and secondly to CLEC
 - In some instances when a second line is provisioned to a customer, there is no copper facility to the premise on the drop wire. Two lines are provisioned on the same copper pair and thus can not be cut without being re-provisioned
- Physical wiring on frames maybe complex e.g. frames on multiple floors, which limits the number of lines that can be pre-wired for a cut.